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August 30, 2023

Hon. Jennifer H. Rearden U.S. District Judge Southern District of New York 500 Pearl St. New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED ATE FILED: 9/1/2023

Re: United States v. Tan et al, 23-cr-015 (JHR)

Request to Continue Sentencing with the Consent of the Government

Dear Judge Rearden,

My office represents Mr. Tan in the above proceedings.

With the consent of the Government, I am requesting an adjournment of Mr. Tan's sentencing.

We are asking for a date in the first week of November as the co-defendant is getting sentenced on November 9th, 2023.

Thank you for your time and attention to this matter.

Sincerely,

By:

The Court scheduled Defendant Chen's November 9, 2023 sentencing proceeding more than two months ago. Thus, to the extent that Defendant Tan wished to coordinate his sentencing with that of Defendant Chen, there was no need to wait until August 30, 2023 at 6:18 p.m.the longstanding deadline for Defendant Tan's sentencing submission—to seek an adjournment (and then fail to file that submission without having requested an extension).

/s/

Robert Osuna, Esq.

Although Defendant Tan's sentencing will be adjourned, the Court is unable to hold that proceeding in the first week of November. The sentencing will be adjourned to either the week of November 13 or November 27. The Court will also briefly adjourn Defendant Law Office of Robert Osuna, PC Chen's sentencing. By September 8, 2023, all parties shall jointly propose new dates in the weeks of November 13 and 27 for Defendant Tan's and Chen's sentencing proceedings.

SO ORDERED.

Date: Sept. 1, 2023